



27 February 2013

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Subject: EB Docket No. 06-36 - CPNI Certification CY 2012 for Astrium Services Business Communications, Inc.

Dear Ms. Dortch:

Astrium Services Government, Inc. hereby submits the attached CPNI certification for CY 2012 on behalf of Astrium Services Business Communications, Inc. ("ASBC" and f/k/a Marlink, Inc.).

A statement of the operating procedures used by ASBC to ensure compliance with the Commission's Rules regarding the use of Customer Proprietary Network Information is also included.

A copy of this filing has been submitted to the Commission's contract copier as well. Please contact the undersigned at 301-838-7807 with any questions about this filing.

Respectfully submitted,

Robert W. Swanson
Associate Counsel

cc: Marcy Greene (marcy.greene@fcc.gov)
Best Copy and Printing, Inc. (fcc@bcpiweb.com)

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2012

Date filed: February 27, 2013

Name of Company covered by this certification:

Astrium Services Business Communications, Inc. ("ASBC") – Form 499 Filer ID: 823054

Name of signatory: Tom Collins

Title of signatory: President

I, Tom Collins, certify that I am an officer of ASBC, and acting as an agent of ASBC, that I have personal knowledge that ASBC has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how ASBC's procedures ensure that ASBC is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

ASBC has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. ASBC has not discovered any information related to the processes pretexters are using to attempt to access CPNI other than the publicly disclosed information available in this docket.

ASBC has established practices and procedures to CPNI, as detailed in the accompanying statement.

ASBC has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed _____/s/_____

Tom Collins
President

STATEMENT OF CPNI COMPLIANCE

This compliance statement applies to Astrium Services Business Communications, Inc. (“ASBC”)

ASBC’s operating procedures ensure compliance with the Communications Act of 1934 (as amended) and FCC Rules regarding the use of CPNI. Our Company policy clearly states that the use, disclosure of, or permitting access to our customers’ CPNI is strictly prohibited absent the requisite customer approval, except as required by law, or under the exceptions set forth at 47 U.S.C. § 222 and 47 C.F.R. §§ 64.2001 et seq.

Definition of CPNI

Our Company policy defines CPNI as follows:

“CPNI is generally defined as any information about a customer that a communications carrier receives by virtue of its provision of telecommunications service to the customer. It includes not only subscriber information provided by the customer, but also billing records, call history, patterns of use, and other types of information that are derived from the customer’s use of the carrier’s services.”

Restrictions on the Use of CPNI and Permissible Uses

As stated above, ASBC’s use of CPNI is restricted, as required by statute and the FCC’s Rules. Employee access to CPNI is limited, and employees are instructed that the use or disclosure of CPNI to individuals inside or outside of ASBC is strictly prohibited except as required by law (e.g. a lawful law enforcement subpoena) or as provided in exceptions set forth at 47 U.S.C. § 222 or 47 C.F.R. § 2005 (e.g. for billing purposes).

CPNI Notifications

ASBC does not use CPNI for marketing purposes and thus has not implemented either “opt-in” or “opt-out” CPNI approval procedures. Because of this limited use of CPNI, ASBC has not implemented the applicable CPNI notification requirements as set forth in the Commission’s Rules at 47 C.F.R. § 64.2008. If ASBC in the future decides to change its use of CPNI, it will first notify customers of their CPNI rights as required by 47 C.F.R. § 64.2008.

Breaches of Data Security

In accordance with 47 C.F.R. § 2011 (a), ASBC will notify the United States Secret Service and the Federal Bureau of Investigation via the online Data Breach Reporting Portal in the event of a data breach. Unless law enforcement directs otherwise, ASBC will notify the affected customers after the expiration of the seven (7) day waiting period. In accordance with 47 C.F.R. § 2011 (d), ASBC will maintain a record of any breaches discovered, notifications made to law enforcement, and notifications made to customers for at least two (2) years.

CPNI Compliance Review

ASBC's legal department reviews uses of CPNI and ensures compliance with the Communications Act of 1934 and the FCC's Rules regarding CPNI. Employees are advised to direct any questions regarding the use of CPNI to the legal department.

Disciplinary Procedures

ASBC has informed employees that it considers compliance with the Communications Act of 1934 and the FCC's Rules regarding the use, disclosure, and access to CPNI to be of utmost importance. Employees have been advised that violations of ASBC's CPNI policy will lead to strong disciplinary action.